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**VIA ECF**

Hon. Brian M. Cogan  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: November 7, 2019 Initial Status Conference in  
*Estate of Eitam Henkin, et al. v. Kuveyt Bank*, No. 1:19-cv-05394-BMC

Dear Judge Cogan:

I represent Plaintiffs in the above-captioned matter, and my motion to appear *pro hac vice* was filed today. I write regarding the initial status conference scheduled for November 7, 2019, to include all counsel of record, and about which Plaintiff's counsel must notify all attorneys.

Defendant's counsel is not currently known to Plaintiff. Further, Defendant, a Turkish entity, has not yet been served with the complaint and likely will not be served by November 7. The complaint was filed on September 23. After commissioning the appropriate Turkish translations, the service materials were sent to the relevant central authority according to the Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters, commonly referred to as "the Hague Convention." Service of process through the Hague Convention may require several months to complete, and I anticipate that service likely will not be complete by November 7. As a result, Defendant's counsel likely will not have entered a notice of appearance by (or have reasonable notice in advance of) that date. Accordingly, Plaintiff's counsel will likely be the only counsel to attend the currently scheduled initial status conference.

I and my colleagues are available and will plan to attend on November 7, but the Court may prefer to reschedule the initial status conference to a future a time—after service has been completed—when both Plaintiff's and Defendant's counsel can attend. Plaintiff's counsel will alert the Court when service is complete by promptly filing a notice of return of service and a letter providing the Court with a status update—and through any additional means the Court directs.

Please do not hesitate to contact me should the Court want any additional information.

Respectfully submitted,

/s/ Michael A. Petrino

Michael A. Petrino (*pro hac vice pending*)